
KLEE, TUCHIN, BOGDANOFF & STERN LLP
1999 Avenue of the Stars, 39th Floor
Los Angeles, California 90067
(310) 407-4000 (telephone)
(310) 407-9090 (facsimile)
David M. Stern
Kenneth N. Klee (KK-5910)
Daniel J. Bussel

-and-

VENABLE LLP
The Chrysler Building
405 Lexington Avenue, 56th Floor
New York, New York 10174
(212) 983-3850 (telephone)
(212) 307-5598 (facsimile)
Edward A. Smith (ES-2461)

Counsel for Enron Creditors Recovery Corp. f/k/a Enron Corp.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

ENRON CREDITORS RECOVERY CORP.,
et al.,

Reorganized Debtors.

ENRON CREDITORS RECOVERY CORP.,

Appellant,

v.

INTERNATIONAL FINANCE CORP., *et al.*,

Appellees.

x

No. 01-16034 (AJG)

Chapter 11

x

Case No. 07 Civ. 06597 (AKH)

x

**NOTICE OF MOTION FOR *PRO HAC VICE*
ADMISSION OF DAVID M. STERN**

PLEASE TAKE NOTICE THAT upon the annexed declarations of Edward A.

Smith dated August 20, 2007 and David M. Stern dated August 16, 2007, appellant Enron

AUG 20 2007

#85-

624352

2007 AUG 20 11:00 AM
CLERK OF COURT
SOUTHERN DISTRICT OF NEW YORK

Creditors Recovery Corp. f/k/a Enron Corp. will move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge, in Courtroom 14D, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be determined, pursuant to Local Rule 1.3 of the United States District Court for the Southern District of New York, for an order admitting David M. Stern *pro hac vice* as counsel to represent Enron Creditors Recovery Corp. f/k/a Enron Corp. in this appeal and in all related matters.

Dated: New York, New York
August 20, 2007

Respectfully submitted,

VENABLE LLP

By: 

Edward A. Smith (ES-2461)
The Chrysler Building
405 Lexington Avenue, 56th Floor
New York, New York 10174
Telephone: (212) 307-5500
Facsimile: (212) 307-5598

- and -

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LLP
1999 Avenue of the Stars, 39th Floor
Los Angeles, California 90067
(310) 407-4000 (telephone)
(310) 407-9090 (facsimile)
David M. Stern (DS-3689)
Kenneth N. Klee (KK-5910)
Daniel J. Bussel

Counsel for Enron Creditors Recovery Corp.
f/k/a Enron Corp.

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Edward A. Smith (ES-2461)

Counsel for Enron Creditors Recovery Corp. f/k/a Enron Corp.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	x	
In re:	:	No. 01-16034 (AJG)
	:	
ENRON CREDITORS RECOVERY CORP.,	:	Chapter 11
<i>et al.</i> ,	:	
	:	
Reorganized Debtors.	:	
-----	x	
ENRON CREDITORS RECOVERY CORP.,	:	Case No. 07 Civ. 06597 (AKH)
	:	
Appellant,	:	
	:	
v.	:	
	:	
INTERNATIONAL FINANCE CORP., <i>et al.</i> ,	:	
	:	
Appellees.	:	
-----	x	

**DECLARATION OF EDWARD A. SMITH IN SUPPORT OF MOTION
TO ADMIT DAVID M. STERN TO PRACTICE *PRO HAC VICE***

Pursuant to 28 U.S.C. § 1746, Edward A. Smith, declares as follows:

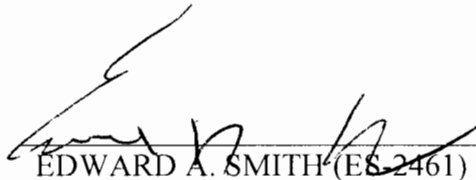
1. I am an attorney admitted to practice before this Court and am a partner at Venable LLP, counsel for Enron Creditors Recovery Corp. f/k/a Enron Corp. ("Enron"). I submit this declaration in support of Enron's motion seeking to admit David M. Stern *pro hac vice* as counsel to represent Enron in this appeal and in all related matters.

2. Mr. Stern is a partner at the firm Klee, Tuchin, Bogdanoff & Stern LLP, 1999 Avenue of the Stars, 39th floor, Los Angeles, California 90067. Upon information and belief, Mr. Stern is and has been a member in good standing of the bar of the State of California and has no pending disciplinary proceedings against him in any state or federal court.

3. Mr. Stern agrees to pay the fee of \$25.00 upon entry of an order admitting him to practice *pro hac vice* in this case. Mr. Stern's telephone number is (301) 407-4025 and his e-mail address is dstern@ktbslaw.com.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
August 20, 2007


EDWARD A. SMITH (ES-2461)

KLEE, TUCHIN, BOGDANOFF & STERN LLP
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Los Angeles, California 90067
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Edward A. Smith (ES-2461)

Counsel for Enron Creditors Recovery Corp. f/k/a Enron Corp.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	x	
	:	No. 01-16034 (AJG)
In re:	:	
	:	Chapter 11
ENRON CREDITORS RECOVERY CORP.,	:	
<i>et al.</i> ,	:	
	:	
Reorganized Debtors.	:	
-----	x	
ENRON CREDITORS RECOVERY CORP.,	:	Case No. 07 Civ. 06597 (AKH)
	:	
Appellant,	:	
	:	
v.	:	
	:	
INTERNATIONAL FINANCE CORP., <i>et al.</i> ,	:	
	:	
Appellees.	:	
-----	x	

**DECLARATION OF DAVID M. STERN
IN SUPPORT OF MOTION FOR *PRO HAC VICE* ADMISSION**

Pursuant to 28 U.S.C. § 1746, David M. Stern declares as follows:

1. I submit this declaration in support of the motion to admit me *pro hac vice* before the United States District Court for the Southern District of New York to represent Enron Creditors Recovery Corp. f/k/a Enron Corp. ("Enron") in this appeal and in all related matters.

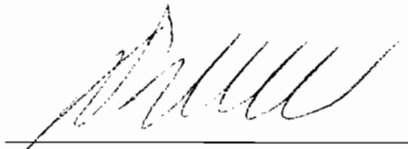
2. Attached as Exhibit A is a true and correct copy of a certificate of good standing issued by the bar of the State of California.

3. I am partner at the firm Klee, Tuchin, Bogdanoff & Stern LLP, 1999 Avenue of the Stars, 39th floor, Los Angeles, California 90067. I am and have been a member in good standing of the bar of the State of California. There are no pending disciplinary proceedings against me in any state or federal court.

4. I agree to pay the fee of \$25.00 upon entry of an order admitting me to practice *pro hac vice* in this case. My telephone number is (301) 407-4025 and my e-mail address is dstern@ktbslaw.com.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: Los Angeles, California
August 16, 2007



DAVID M. STERN

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
In re:	:	No. 01-16034 (AJG)
	:	
ENRON CREDITORS RECOVERY CORP.,	:	Chapter 11
<i>et al.</i> ,	:	
	:	
Reorganized Debtors.	:	
-----	X	
ENRON CREDITORS RECOVERY CORP.,	:	Case No. 07 Civ. 06597 (AKH)
	:	
Appellant,	:	
	:	
v.	:	
	:	
INTERNATIONAL FINANCE CORP., <i>et al.</i> ,	:	
	:	
Appellees.	:	
-----	X	

**ORDER GRANTING MOTION FOR
PRO HAC VICE ADMISSION OF DAVID M. STERN**

This matter having come before the Court on the motion for an order permitting David M. Stern, a partner at the firm Klee, Tuchin, Bogdanoff & Stern LLP, to practice *pro hac vice* before the United States District Court for the Southern District of New York (the "Motion") to represent Enron Creditors Recovery Corp. f/k/a Enron Corp. ("Enron") in this appeal and in all related matters:

IT IS HEREBY ORDERED that the Motion is hereby granted, and David M. Stern is hereby admitted *pro hac vice* before this Court to represent Enron in this appeal and in all related matters.

Dated: New York, New York
August __, 2007

UNITED STATES DISTRICT JUDGE



THE
STATE BAR
OF CALIFORNIA

180 HOWARD STREET
SAN FRANCISCO, CALIFORNIA 94105-1639
TELEPHONE (415) 538-2000

August 9, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, DAVID MARC STERN, #067697 was admitted to the practice of law in this state by the Supreme Court of California on December 18, 1975; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; that the public record states that information has been provided pursuant to Business and Professions Code section 6086.1(c); and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

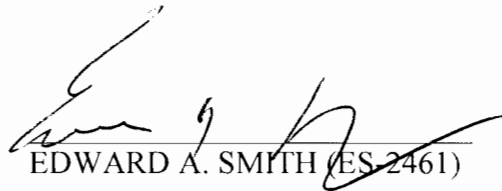
Kath Lambert
Custodian of Membership Records

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 20, 2007 I caused the foregoing Notice of Motion for *Pro Hac Vice* Admission of David M. Stern and the accompanying declarations of Edward A. Smith and David A. Stern to be sent by first-class mail the following:

Stephen J. Shimshak, Esq.
Paul, Weiss, Rifkind, Wharton & Garrison LLP
1285 Avenue of the Americas
New York, New York 10019-6064

Douglas R. Davis, Esq.
Paul, Weiss, Rifkind, Wharton & Garrison LLP
1285 Avenue of the Americas
New York, New York 10019-6064


EDWARD A. SMITH (ES-2461)